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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8MO

January 23, 2001

Ms. Katie Bump
Lemhi Pass ID Team Leader
Beaverhead-Deerlodge National Forest
420 Barrett Street
Dillon, Montana 59725

Re: Draft EIS for the Lemhi Pass National
Historic Landmark Management Plan

Dear Ms. Bump:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency, Region VIII, Montana Office (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS).

The EPA is supportive of the Forest Service's proposal to improve roads, trails, picnic and parking facilities as well as to increase access to historic features and provide improved historical interpretation at the Lemhi Pass National Historic Landmark on the Beaverhead-Deerlodge and Salmon-Challis National Forests on the Montana-Idaho border. The EPA does not object to the Forest Service's preferred alternative, Alternative 5. We particularly support the proposed Alternative 5 increase in acreage of land that would be withdrawn from locatable mineral entry from 400.41 acres presently to 1,505.29 acres. This withdrawal of lands from mineral entry around the National Historic Landmark is needed to preserve the area's cultural heritage and scenic and recreational value. The EPA also supports inclusion of soil conservation measures and best management practices to mitigate the effects of erosion and sediment transport that may result from road and trail construction and from increased usage of roads and trails near Agency Creek and Trail Creek. The EPA supports closure of Agency Creek Trail to motorized use and horses to protect Agency Creek water quality.

Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the Draft Environmental Impact Statement for the Lemhi Pass National Historic Landmark Management Plan has been rated as **Category LO** (Lack of Objections). A copy of EPA's rating criteria is attached.



The EPA appreciates the opportunity to review and comment on the DEIS. If you have any questions please contact Mr. Steve Potts of my staff in Helena at (406) 441-1140 ext. 232.

Sincerely,

John F. Wardell
Director
Montana Office

cc: Cindy Cody/Yolanda Martinez, EPA, 8EPR-EP, Denver
William Ryan, EPA, NEPA Review, Seattle
J. Richard Ward, District Ranger, Leadore, Idaho
David S. Fallis, District Ranger, Dillon, Montana

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

SUMMARY PARAGRAPH FORM

ERP NUMBER

RATING ASSIGNED TO PROJECT

LO

**NAME OF EPA OFFICIAL RESPONSIBLE
FOR REVIEW OF PROJECT (Principle Reviewer)**

Steve Potts

SUMMARY OF COMMENT LETTER

The EPA has reviewed the Draft Environmental Impact Statement (DEIS) for the Lemhi Pass National Historic Landmark Management Plan on the Beaverhead-Deerlodge and Salmon-Challiss National Forests. The EPA review did not identify any potential environmental impacts requiring substantive changes to the proposal. The EPA does not object to the Forest Service's preferred alternative, Alternative 5, that involves improved public access and facilities and historic interpretation at the Lemhi Pass National Historic Landmark.

PARAGRAPH APPROVED FOR PUBLICATION

(Initials of OFA
Approving Official)

NOTE: Transmit 2 copies to MIU

8MO File: 9917

Lemhi Pass National Historic Landmark Management Plan DEIS

Brief Project Overview:

The Beaverhead-Deerlodge National Forest and Salmon-Challis National Forest have prepared an EIS that analyzes five alternatives, including no action, for management of the Lemhi Pass National Historic Landmark. Lemhi Pass is a mountain pass in the Beaverhead Mountains along the Continental Divide between the Horse Prairie Valley in Montana and Salmon River Valley in Idaho. Lemhi Pass was designated a National Historic Landmark in 1960 for its significance to the Lewis and Clark expedition in 1805. It was a point of hopeful anticipation, as the expedition looked forward to meeting the Shoshone and trading for horses to continue their journey, and a point of disappointment as it became obvious that a navigable waterway to the West Coast would not be found among these rugged mountains. The Lemhi Pass National Historic Landmark covers 480.41 acres, and presently includes unpaved access roads, Sacajawea Memorial Camp, including the Most Distant Fountain Spring, and is near the Continental Divide National Scenic Trail. Two streams are in the project area, Agency Creek in Idaho, and Trail Creek in Montana.

Management alternatives involve different levels and types of alterations and additions to facilities and include a range of sizes of mineral withdrawals for the National Historic Landmark. Alternative 1, the initial proposed action, involves development of facilities and management direction that include withdrawing 480.41 acres from mineral entry, improving roads and parking areas, sanitation facilities etc.,. Alternative 2, is no action, which would continue the existing management with its designation of 400.41 acres for mineral withdrawal and maintain the present level of development. Alternative 3 would include a restoration emphasis to develop facilities and the landscape to resemble the condition in 1805, including 643.13 acres of mineral withdrawal. Alternative 4 would emphasize recreational development and improvement and addition to facilities that would include 480.41 acres of mineral withdrawal.

Alternative 5 was developed based on public and interdisciplinary review and comment on the first four alternatives and is the preferred alternative. Alternative 5 includes 1,505.29 acres of mineral withdrawal, and provides for rehabilitation of the historic properties. Alternative 5 would include development and operation of Sacajawea Memorial Camp as a picnic facility with improved sanitation facilities; relocation of the Continental Divide road south of Lemhi Pass, and construction of 0.3 miles of a new road to access the picnic Camp; a new parking area (5-10 car capacity); development of a trail between Sacajawea Memorial Camp and Most Distant Fountain Spring and an interpretive site; a new Westward view interpretive site with parking area would be developed 0.8 miles north of Lemhi Pass along Warm Springs Wood Road; horseback riding trails would be established; and the Continental Divide Scenic Trail would be relocated.